



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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December 13, 2007

Ref: 8EPR-N

Floyd Johnson
Bureau of Land Management
Price Field Office RMP Comments
125 South 600 West
Price, Utah 84501

RE: Supplement to the Draft Resource
Management Plan and Environmental Impact
Statement for the Price Field Office Planning
Area's Non-WSA Lands with Wilderness
Characteristics CEQ#: 20070383

Dear Mr. Johnson:

Consistent with our responsibilities and authorities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the Region 8 Office of the U.S. Environmental Protection Agency (EPA) has reviewed the Supplement to the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Price Field Office Planning Area's Non-Wilderness Study Area (WSA) Lands with Wilderness Characteristics. This Supplement analyzes a sixth alternative, Alternative E, which emphasizes managing all of these lands to preserve and protect their wilderness characteristics. Wilderness characteristics include the appearance of naturalness, outstanding opportunities for solitude or primitive and unconfined recreation, and an area generally 5,000 acres or larger which may include WSAs.

EPA previously submitted comments on: 1) the Draft RMP/EIS in a November 30, 2004 letter; and 2) the Supplemental Information and Analysis for Areas of Critical Environmental Concern (ACECs) in a September 7, 2006 letter. Both of these documents are enclosed for your reference. EPA is particularly interested in the cumulative impacts from all reasonably foreseeable development, air quality impact analysis including long-range protection of visibility, habitat impact analysis particularly from invasive non-native species, and mitigation for all resources which might be improved through curtailing activities during severe drought.

Alternative E proposes to add protective management prescriptions for all 937,440 acres of non-WSA lands with or likely to have wilderness characteristics in 27 areas. These include closing these areas to mineral leasing and off-highway vehicles, excluding rights-of-way, and protecting undisturbed landscapes and opportunities for primitive and semi-primitive recreation opportunities. We believe BLM should consider these management prescriptions for some of the 275,000 acres of ACECs located within non-WSA lands with wilderness characteristics in order

to enhance protection of relic vegetation, cultural, paleontological, and historic resources, scenic and ecological values, wildlife, and other important resources. More specifically, this level of protection is needed in areas where significant environmental impacts are occurring or are likely to occur from oil and gas development, off-highway vehicle use, and other surface disturbing activities. These areas include the Nine Mile Canyon, Lower Green River, San Rafael Canyon, Dry Lake, and Desolation Canyon ACECs.

We also believe these management prescriptions can complement protection of 141 of 641 miles of suitable river segments for possible wild, scenic, and recreational designation. These segments include the Price and San Rafael Rivers, Muddy Creek, Cane Wash, and Nine Mile Creek. These prescriptions are particularly important for restoring and protecting valuable riparian systems and wetlands along these segments that are: 1) not in proper functioning condition which represent approximately 25% of the riparian resources within the Price Field Office's Planning Area; 2) particularly vulnerable to grazing and other impacts; and 3) located along steeper slopes or more erodible or sensitive (e.g., saline) soils.

EPA has a responsibility to independently evaluate the potential environmental impacts associated with this Draft RMP/EIS, including this Supplemental Information. As we concluded in our November 30, 2004 letter, we are rating this Proposed Action and Preferred Alternative (D) as "EC-2" under EPA's rating criteria which are enclosed. The "EC" rating means that our review identified several environmental impacts that should be avoided to fully protect the environment (Environmental Concerns, or "EC"). As previously stated, the EC rating is based on EPA's concerns regarding the potential impacts to aquatic resources, water quality, air quality, sensitive/rare wildlife, soil erosion, recreational resources and experiences, and wildlife habitats.

The "2" rating means that the Draft RMP/EIS has insufficient information to thoroughly assess environmental impacts. Quantitative estimates of future conditions, or relative differences in qualitative estimates of those conditions showing change over time would be helpful to understand the impacts to air quality, wildlife habitats, vegetation, water quality, and other environmental resources. Because fugitive dust conditions could approach the National Ambient Air Quality Standards for particulate matter, additional information on fugitive dust conditions should be provided in the Final RMP/EIS as suggested in the comments of our November 30, 2004 letter. If you would like to discuss these comments, or any other issues related to our review of the Draft RMP/EIS, please contact Douglas Minter at 303-312-6079, or by email at minter.douglas@epa.gov.

Sincerely,

/s/ Deborah Lebow Aal
for Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosures

cc: Laura Romin, FWS, Salt Lake City
Gilbert Hunt, Utah DNR, Salt Lake City
Harry Judd, Utah DEQ, Salt Lake City